

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,  
New York,

Chapter 11

Debtor.

Judge Wendy A. Kinsella

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**MONTHLY FEE STATEMENT OF BURNS BAIR LLP FOR COMPENSATION OF  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS  
SPECIAL INSURANCE COUNSEL FOR THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR THE PERIOD OF  
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

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Pursuant to the Court's *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [ECF No. 117] (the "Interim Compensation Order"), Burns Bair LLP, special insurance counsel for the Official Committee of Unsecured Creditors (the "Committee"), hereby files this monthly fee statement (the "Monthly Fee Statement") seeking compensation for reasonable and necessary services rendered to the Committee from November 1, 2023 through November 30, 2023 (the "Compensation Period") in the amount of \$28,389.20 (80% of \$35,486.50), and reimbursement of actual and necessary expenses incurred during the Compensation Period in the amount of \$1,207.01.

Burns Bair LLP's invoice for the Compensation Period, attached hereto as **Exhibit A**, includes detailed time entries that describe the services performed by Burns Bair LLP professionals during the Compensation Period and a list of expenses Burns Bair LLP incurred during the Compensation Period in connection with providing services to the Committee.

[Signature page follows]

Date: December 21, 2023

/s/ Timothy W. Burns

Timothy W. Burns (WI State Bar #1068086)

Jesse J. Bair (WI State Bar #1083779)

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*Special Insurance Counsel for the Official  
Committee of Unsecured Creditors*

## Burns | Bair

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**Official Committee of Unsecured Creditors of  
the Diocese of Syracuse, New York**

**Issue Date :** 12/20/2023

**Bill # :** 01296

**Matter:** Insurance

### PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
11/1/2023	Timothy Burns	Review correspondence with Stinson and the Committee re claims reviewer candidates (.1); review correspondence with Stinson and the Committee re November 2 hearing (.1);	0.20	\$140.00
11/1/2023	Karin Jonch-Clausen	Prepare additional hearing prep material for T. Burns re LMI's claim objection motion (.4);	0.40	\$168.00
11/1/2023	Jesse Bair	Review additional correspondence from E. Caldie re LMI claim objection hearing and potential claims reviewers (.1);	0.10	\$62.50
11/2/2023	Timothy Burns	Prepare for LMI claim objection hearing (2.9); participate in call with J. Bair re hearing prep issues (.1); participate in motion hearing re LMI's claims objections procedure (2.4); participate in meetings with Stinson team re outcome of same and next-steps (.7); participate in call with J. Bair re same (.1);	6.20	\$4,340.00
11/2/2023	Jesse Bair	Participate in call with T. Burns re preparation and strategy for LMI claim objection hearing (.1); correspondence with T. Burns re LMI claim exposure (.1); attend the LMI claim objection hearing (2.0); participate in call with T. Burns re outcome of the LMI claim objection hearing and next-steps (.1);	2.30	\$1,437.50
11/2/2023	Jesse Bair	Review and edit Burns Bair interim fee application (.6); correspondence with Stinson re same (.1);	0.70	\$437.50
11/3/2023	Jesse Bair	Additional analysis re next-steps for case insurance strategy in light of LMI claim objection hearing outcome (.2);	0.20	\$125.00
11/6/2023	Jesse Bair	Participate in conference with T. Burns re insurance case developments and next-steps (.1);	0.10	\$62.50

11/6/2023	Timothy Burns	Met with J. Bair re insurance case developments and next-steps (.1);	0.10	\$70.00
11/7/2023	Karin Jonch-Clausen	Participate in call with J. Bair, T. Burns and Stinson team regarding next steps (.1);	0.10	\$42.00
11/7/2023	Jesse Bair	Participate in conference with Stinson team and T. Burns re recent case developments, insurance strategy, and ongoing projects (.2);	0.20	\$125.00
11/7/2023	Timothy Burns	Participate in conference with Stinson team and J. Bair re recent case developments, insurance strategy, and ongoing projects (.2);	0.20	\$140.00
11/8/2023	Jesse Bair	Correspond with Stinson team re Arrowood liquidation update (.1);	0.10	\$62.50
11/8/2023	Jesse Bair	Analyze Travelers' recent coverage correspondence and draft response to same (.6);	0.60	\$375.00
11/9/2023	Jesse Bair	Correspondence with Stinson team re impact of Arrowood liquidation on the motion to terminate the mediation stay (.1);	0.10	\$62.50
11/9/2023	Timothy Burns	Review and revise the Committee's response to Travelers' termination of mediation stay motion (.4); conference with J. Bair re same (.2); review correspondence from R. Kugler re settlement offer re insurer (.1);	0.70	\$490.00
11/9/2023	Timothy Burns	Review correspondence with J. Bair and Travelers re Travelers' proposed settlement meeting (.2); review correspondence with J. Bair and Travelers re Travelers' termination of mediation stay motion (.1);	0.30	\$210.00
11/9/2023	Jesse Bair	Review and edit the Committee's opposition to Travelers' motion to terminate the mediation stay (.5);	0.50	\$312.50
11/9/2023	Jesse Bair	Correspondence with Travelers re supplemental mediation session (.1);	0.10	\$62.50
11/10/2023	Timothy Burns	Prepare for settlement meeting with Travelers (.3); met with J. Bair re same (.2);	0.50	\$350.00
11/10/2023	Jesse Bair	Review Travelers' correspondence re upcoming settlement conference (.1);	0.10	\$62.50
11/10/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy and Travelers settlement conference (.2);	0.20	\$125.00
11/13/2023	Timothy Burns	Participate in call with R. Kugler re Plan insurance issues (.1); additional analysis re same (.1);	0.20	\$140.00
11/13/2023	Timothy Burns	Participate in call with J. Bair re Travelers settlement conference (.1);	0.10	\$70.00
11/13/2023	Jesse Bair	Review and edit the draft Committee/Debtor Plan for insurance purposes (4.3);	4.30	\$2,687.50
11/13/2023	Jesse Bair	Participate in call with T. Burns re insurance Plan issues (.1);	0.10	\$62.50

11/13/2023	Jesse Bair	Participate in call with T. Burns re Travelers settlement conference (.1);	0.10	\$62.50
11/13/2023	Jesse Bair	Review and respond to correspondence with Travelers re supplemental mediation session (.2);	0.20	\$125.00
11/13/2023	Timothy Burns	Participate in call with J. Bair re insurance Plan issues (.1);	0.10	\$70.00
11/14/2023	Karin Jonch-Clausen	Continue supplemental per-claim analysis of Travelers' POCs in advance of upcoming Travelers mediation (3.2);	3.20	\$1,344.00
11/14/2023	Jesse Bair	Analysis re Travelers exposure, including parish exposure, in connection with formulating revised demand to Travelers (.3);	0.30	\$187.50
11/14/2023	Jesse Bair	Review correspondence with L. Kugler and the Committee re upcoming Committee meeting (.1);	0.10	\$62.50
11/14/2023	Karin Jonch-Clausen	Review J. Bair correspondence re supplemental Travelers analysis needed in connection with upcoming mediation (.2); begin supplemental per-claim analysis of Travelers' POCs in advance of upcoming Travelers mediation (3.4);	3.60	\$1,512.00
11/14/2023	Jesse Bair	Provide instructions to K. Jonch-Clausen re additional Travelers analysis needed in advance of upcoming mediation session (.4);	0.40	\$250.00
11/15/2023	Karin Jonch-Clausen	Continue supplemental per-claim analysis of Travelers' POCs in advance of upcoming Travelers mediation (3.5);	3.50	\$1,470.00
11/15/2023	Jesse Bair	Additional analysis re potential revised demand to Travelers (.2); correspondence with T. Burns re same (.1); correspondence with Stinson team re same (.2);	0.50	\$312.50
11/15/2023	Timothy Burns	Review and respond to J. Bair correspondence re Travelers' settlement analysis and action items (.2); review correspondence from Travelers and J. Bair re settlement meeting (.2); review internal BB emails re prep for meeting with Travelers re settlement (.2); review and analyze Prudential Lines 2nd Circuit opinion in connection with issues concerning resolving matters with insurers (.7);	1.30	\$910.00
11/15/2023	Jesse Bair	Respond to K. Jonch-Clausen question re additional Travelers analysis (.1);	0.10	\$62.50
11/16/2023	Jesse Bair	Draft email memo to the Committee re insurance case update, proposed Travelers counter, and overall insurance strategy (.5);	0.50	\$312.50
11/16/2023	Jesse Bair	Correspondence with L. Kugler re Committee insurance meeting (.1);	0.10	\$62.50
11/16/2023	Jesse Bair	Participate in call with Stinson, state court counsel, and T. Burns re Plan issues and Travelers mediation session (.3);	0.30	\$187.50

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11/16/2023	Timothy Burns	Participate in call with state court counsel, Stinson, and J. Bair re insurance Plan issues (.3); participate in additional call with J. Bair re Plan issues and mediation (.2); participate in call with Stinson re Travelers' counter (.2); participate in call with state court counsel re same (.2); review and respond to correspondence from K. Jonch-Clausen re prep for Travelers settlement meeting (.2);	1.10	\$770.00	
11/16/2023	Karin Jonch-Clausen	Continue supplemental per-claim analysis of Travelers' POCs in advance of upcoming Travelers mediation (1.7);	1.70	\$714.00	
11/16/2023	Jesse Bair	Participate in call with T. Burns re Plan and mediation issues (.2);	0.20	\$125.00	
11/17/2023	Jesse Bair	Prepare for upcoming Travelers mediation session, including assessment of Travelers' exposure and Travelers' purported liability defenses to certain claims (.8);	0.80	\$500.00	
11/17/2023	Timothy Burns	Participate in call with state court counsel re Travelers' demand (.1); participate in Committee meeting re same (.4); additional analysis re Travelers demand issues (.1); participate in call with J. Bair re counter to Travelers and Travelers' response (.3);	0.90	\$630.00	
11/17/2023	Jesse Bair	Correspondence with Travelers re the Committee's revised mediation demand (.1); review Travelers' preliminary response to same (.1);	0.20	\$125.00	
11/17/2023	Jesse Bair	Participate in call with L. Kugler re upcoming Travelers' mediation and potential demand to Travelers (.1); participate in additional call with L. Kugler and E. Caldie re same (.1);	0.20	\$125.00	
11/17/2023	Jesse Bair	Participate in call with T. Burns re counter to Travelers and strategy for upcoming mediation session (.3);	0.30	\$187.50	
11/18/2023	Timothy Burns	Participate in call with J. Bair re Travelers' mediation (.1);	0.10	\$70.00	
11/18/2023	Jesse Bair	Provide instructions to K. Jonch-Clausen re additional claim-specific Travelers analysis needed in connection with upcoming mediation (.2);	0.20	\$125.00	
11/18/2023	Jesse Bair	Participate in call with T. Burns re Travelers' mediation (.1);	0.10	\$62.50	
11/18/2023	Jesse Bair	Draft response to Travelers' recent mediation correspondence (.9); analyze applicable case law in connection with same (.3);	1.20	\$750.00	
11/19/2023	Jesse Bair	Review revised version of the draft Debtor/Committee Plan (1.1); correspondence with Stinson team re same (.1);	1.20	\$750.00	

11/19/2023	Karin Jonch-Clausen	Draft revised summary of supplemental per-claim analysis for use during upcoming Travelers mediation (1.1);	1.10	\$462.00
11/19/2023	Jesse Bair	Brief review re Plan allocation protocol (.1);	0.10	\$62.50
11/20/2023	Jesse Bair	Analyze revised Travelers claims analysis prepared by K. Jonch-Clausen (.2); participate in conference with K. Jonch-Clausen re same and additional edits needed (.2);	0.40	\$250.00
11/20/2023	Karin Jonch-Clausen	Participate in conference with J. Bair re additional edits needed to supplemental per-claim Travelers analysis (.2);	0.20	\$84.00
11/20/2023	Jesse Bair	Correspondence with R. Kugler re upcoming Travelers mediation (.1);	0.10	\$62.50
11/20/2023	Jesse Bair	Conference with T. Burns re Plan issues and Travelers mediation (.2)	0.20	\$125.00
11/20/2023	Timothy Burns	Review correspondence with J. Bair and Stinson re Travelers' settlement meeting (.1); conference with J. Bair re same and Plan issues (.2);	0.30	\$210.00
11/20/2023	Karin Jonch-Clausen	Finalize summary of supplemental per-claim analysis for use during upcoming Travelers mediation (2.2);	2.20	\$924.00
11/20/2023	Timothy Burns	Review correspondence with Stinson and the Committee re post-confirmation trustee (.2);	0.20	\$140.00
11/21/2023	Jesse Bair	Prepare for Travelers mediation (.5);	0.50	\$312.50
11/21/2023	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re Plan issues (.9);	0.90	\$562.50
11/21/2023	Timothy Burns	Conference with J. Bair re outcome of Travelers' mediation and hearing on Travelers' motion to terminate the mediation stay (.2);	0.20	\$140.00
11/21/2023	Jesse Bair	Review further revised version of the Plan (.2);	0.20	\$125.00
11/21/2023	Jesse Bair	Participate in Zoom Travelers mediation (1.9);	1.90	\$1,187.50
11/21/2023	Jesse Bair	Conference with T. Burns re outcome of Travelers mediation and hearing on Travelers' motion to terminate the mediation stay (.2);	0.20	\$125.00
11/22/2023	Timothy Burns	Review and respond to correspondence from J. Bair re litigation with Travelers (.1);	0.10	\$70.00
11/22/2023	Jesse Bair	Review correspondence with Travelers re Plan issues (.1);	0.10	\$62.50
11/22/2023	Jesse Bair	Participate in call with R. Kugler re outcome of Travelers mediation, Plan issues, and strategy for upcoming lift stay motion hearing (.5); correspondence with T. Burns re same (.1);	0.60	\$375.00
11/22/2023	Jesse Bair	Review and assess upcoming case insurance deadlines and projects (.1);	0.10	\$62.50
11/22/2023	Jesse Bair	Review the Diocese's letter to the Court re Plan status (.1);	0.10	\$62.50
11/25/2023	Jesse Bair	Correspondence with R. Kugler re potential resolution of Travelers' mediation termination of stay motion (.1);	0.10	\$62.50

11/25/2023	Timothy Burns	Review Diocese letter to the Court re submission of Plan (.1);	0.10	\$70.00
11/27/2023	Jesse Bair	Review the Court's text order re hearing on ongoing Plan issues (.1);	0.10	\$62.50
11/27/2023	Jesse Bair	Review Travelers' reply brief in support of its motion to terminate the mediation stay (.2);	0.20	\$125.00
11/27/2023	Karin Jonch-Clausen	Analyze and identify key prep materials for hearing on Travelers' motion to terminate the mediation stay (.8);	0.80	\$336.00
11/28/2023	Jesse Bair	Participate in call with T. Burns re strategy for upcoming hearing on Travelers' motion to terminate the mediation stay (.2);	0.20	\$125.00
11/28/2023	Jesse Bair	Review LMI's joinder in Travelers' motion to terminate the mediation stay (.1);	0.10	\$62.50
11/28/2023	Jesse Bair	Begin preparing for hearing on Travelers' motion to terminate the mediation stay (.4);	0.40	\$250.00
11/28/2023	Jesse Bair	Correspondence with Travelers re call to discuss potential resolution of Travelers' termination of mediation stay motion (.1);	0.10	\$62.50
11/28/2023	Timothy Burns	Participate in call with J. Bair re hearing prep and strategy (.2); participate in call with R. Kugler re same (.2);	0.40	\$280.00
11/29/2023	Timothy Burns	Review correspondence with J. Bair and R. Kugler re outcome of call re potential resolution of Travelers' motion to terminate the mediation stay (.1);	0.10	\$70.00
11/29/2023	Jesse Bair	Prepare for call with Travelers re Travelers' motion to terminate the mediation stay (.1); participate in call with Travelers re same and potential resolution of motion (.3); correspondence with R. Kugler and T. Burns re outcome of call with Travelers (.1);	0.50	\$312.50
11/30/2023	Karin Jonch-Clausen	Analyze B. Cawley correspondence re indemnity policy research (.1);	0.10	\$42.00
11/30/2023	Jesse Bair	Continue preparing for hearing on Travelers' motion to terminate the mediation stay (.9);	0.90	\$562.50
11/30/2023	Brian Cawley	Analyze existing research re indemnity policies under New York law (.4); correspond with K. Jonch-Clausen re same (.1);	0.50	\$210.00
11/30/2023	Karin Jonch-Clausen	Prepare for and discuss research project with T. Burns re LMI's anti-assignment indemnity policy argument in connection with Plan issues (.4);	0.40	\$168.00
11/30/2023	Jesse Bair	Participate in pre-hearing conference with Stinson team re hearing preparation, strategy, and ongoing Plan issues (.3);	0.30	\$187.50



11/30/2023	Timothy Burns	Attend telephonically status and motion hearing in main case and insurance adversary re Travelers' motion to terminate the mediation stay (1.5); met with K. Jonch-Clausen re research assignment re LMI's anti-assignment indemnity policy argument in connection with Plan issues (.4); participate in call with J. Bair re outcome of hearing and next-steps (.1);	2.00	\$1,400.00
11/30/2023	Jesse Bair	Participate in hearing for insurance purposes re Travelers' motion to terminate the mediation stay, case status conference, and claim objection motion (1.8); participate in post-hearing conference with Stinson re outcome of same and next-steps (.4); participate in call with T. Burns re same (.1);	2.30	\$1,437.50
11/30/2023	Karin Jonch-Clausen	Begin analysis of LMI's anti-assignment indemnity policy argument (.4);	0.40	\$168.00
<b>Total Hours and Fees</b>			<b>60.90</b>	<b>\$35,486.50</b>

**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/2/2023	Delta Airlines, T. Burns (MSN-SYR, Nov. 2)	\$620.76
11/2/2023	Uber, T. Burns (hearing to airport)	\$31.07
11/2/2023	Uber, T. Burns (airport to hearing)	\$33.61
11/2/2023	Travel meal, T. Burns	\$31.07
11/28/2023	Delta Airlines, J. Bair (SYR-MSN, Nov. 30) [cost split with Buffalo matter]	\$437.20
11/30/2023	Travel meal, J. Bair	\$20.98
11/30/2023	Airport parking, J. Bair	\$15.00
11/30/2023	Travel meal, J. Bair	\$5.32
11/30/2023	Parking in Syracuse for hearing, J. Bair	\$12.00
<b>Total Expenses</b>		<b>\$1,207.01</b>

**Timekeeper Summary**

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brian Cawley	Associate	0.50	\$420.00	\$210.00
Jesse Bair	Partner	27.30	\$625.00	\$17,062.50
Karin Jonch-Clausen	Associate	17.70	\$420.00	\$7,434.00
Timothy Burns	Partner	15.40	\$700.00	\$10,780.00

**Total Due This Invoice: \$36,693.51**

**CERTIFICATE OF SERVICE**

I, Jessica Rehbein, hereby certify that on December 21, 2023, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using CM/ECF and that service was emailed to the following parties:

- a. The Roman Catholic Diocese of Syracuse, New York, 240 East Onondaga Street,  
Syracuse, New York 13202
- b. Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202,  
Attn: Stephen A. Donato
- c. Office of the United States Trustee, 10 Broad Street, Room 105, Utica, New York  
13501, Attn: Erin P. Champion

Date: December 21, 2023

/s/ Jessica Rehbein